



October 11, 2024

VIA ECF

Judge Vince Chhabria
United States District Court
for the Northern District of California
Courtroom 4, 17th Floor
450 Golden Gate Avenue
San Francisco, California 94102

Re: *Kadrey, et al., v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC;
Farnsworth v. Meta Platforms, Inc., Case No. 3:24-cv-06893-VC

Your Honor:

The undersigned counsel in *Kadrey, et al., v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC (“*Kadrey*”), and *Farnsworth v. Meta Platforms, Inc.*, Case No. 3:24-cv-06893-VC (“*Farnsworth*”), jointly submit this letter in response to the Court’s Minute Order of October 4, 2024. *See Kadrey*, Dkt. No. 211; *Farnsworth*, Dkt. No. 20. As ordered by the Court, undersigned counsel met and conferred concerning whether *Farnsworth* should be consolidated with *Kadrey* or stayed, and about leadership issues.

Undersigned counsel agree that judicial economy will be served by consolidating the *Kadrey* and *Farnsworth* actions for largely the same reasons that all parties agreed the actions were related. Should Plaintiff Farnsworth’s claims be added, he immediately will begin producing the appropriate discovery and share his availability for deposition, so there should be no delay.

Subject to the Court’s approval, undersigned counsel agree that Boies Schiller Flexner LLP (“BSF”) should serve as interim lead counsel, and Lieff Cabraser Heimann & Bernstein LLP (“LCHB”) should serve as additional counsel. Both BSF and LCHB are committed to bringing their class-action experience, and specific experience in the intersection of copyright and evolving technologies, to this case. We believe such an arrangement best serves the interests of putative class members in an efficient prosecution of Plaintiffs’ claims.

Respectfully submitted,

/s/ Rachel German
Rachel Geman (*pro hac vice*)

/s/ David Boies
David Boies (*pro hac vice*)



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ATTESTATION PURSUANT TO CIVIL LOCAL RULES 5-1(h)

I, Jesse Panuccio, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above have concurred in this filing.

Dated: October 11, 2024

/s/ Jesse Panuccio
Jesse Panuccio (*pro hac vice*)